Website Privacy Policy

Data Controller

The company responsible for processing your data according to this Privacy Policy is:

GLOBAL HOLDINGS 2000 S.L.

NIF: B63047765

Address: Zurbano, 45, Pl.1 - 28010 (MADRID) E-mail address: legal@globalholdings.es

Website: prociency.com Telephone no.: 935306460

Registered in the Companies Register of Barcelona in volume 35180, folio 58, section B 258790, entry 1st.

At GLOBAL HOLDINGS 2000 S.L., we recognise the importance of protecting your personal information and we are committed to processing it responsibly and in compliance with the data protection laws.

The purpose of this privacy policy is to regulate all the aspects relating to the processing of data of the different users browsing the website or providing their personal details on the different forms to be found on it.

Personal Data

Personal Data is the information that identifies you or may identify you. Through the website, in the boxes that are stablished for that purpose, it is collected the personal data that the User provides us: Name, surname, email, telephone number, postal code, city, etc. In addition, it is collected all the personal data that the User voluntarily provides us through any of the social networks, of which the User is registered. In this case, the privacy settings will depend on both the configuration that the User established as well as the terms and conditions of the social network itself.

When a user visits the website, this does not mean that he/she has to provide any information about his/her personal data. However, if such information is provided, the data will be processed lawfully and subject at all times to the principles and rights contained in the GDPR 2016/679 of 27 April 2016 and the LOPDGDD 3/2018 of 5 December.

Purpose, duration and legitimation of the processing:

We will process the data provided to us by the user for the following purposes:

• To deal with the user's application or request made using the **contact form** on the website. We collect and process the user's personal data to enable us to process and manage his/her application, query or any request made using said form. We will keep these data for the time necessary to comply with the request and for the time established by law, with a minimum duration of 3 years.

The basis for legitimation of the data processing will be the consent granted by the user when checking the box for acceptance of our privacy policy before sending the request. The user has the right to revoke his/her consent at any time, without this affecting the lawfulness of the processing based on the consent given prior to it being withdrawn.

• To improve the user experience when browsing the website. We will keep these data for as long as the user does not revoke his/her consent to them being processed by deleting the cookies, for the time established by law and for a minimum duration of 3 years.

The legitimate basis for improving website browsing is the consent given by the user when accepting the cookies. The user has the right to revoke his/her consent at any time, without this affecting the lawfulness of the processing based on the consent given prior to it being withdrawn.

• To manage our **social networks** and send users information about our activities and products. We will keep these data for as long as the user does not revoke his/her consent to them being processed, for the time established by law and for a minimum duration of 3 years.

The legitimate basis for managing our social networks and sending users our activities and new features is the consent we are given to do so. The user has the right to revoke his/her consent at any time, without this affecting the lawfulness of the processing based on the consent given prior to it being withdrawn.

Assignment or communication of personal data and international transfers:

Your data will not be communicated or transferred to third parties unless there is a legal obligation, or to those service providers associated with the Controller which act as data processors.

Our servers are located within the European Union and generally we have service providers located within the European Economic Area or in countries determined to have an adequate level of data protection.

If we need to use service providers which carry out processing outside the European Union or in countries not determined to have an adequate level of data protection, we will ensure that your data is processed in a secure and legitimate manner on the basis of adequacy decisions, standard data protection clauses, binding corporate rules, exceptions or any other instrument approved by the supervisory authority that offers adequate guarantees for the international transfer of data.

Updating of data

In order for us to keep the personal data up to date, the user must always inform us of any change in said data; if this is not done, we cannot be liable for the veracity of the data.

The user guarantees that the personal data provided are true, and guarantees that all the information provided corresponds to reality, is up to date and is accurate. He/she is obliged to communicate any modification thereto.

Third Party Data

If the user provides third party data for any purpose to GLOBAL HOLDINGS 2000 S.L., he/she guarantees that he/she has obtained these data lawfully, has informed the affected parties in advance, has obtained his/her consent to communicate them, and that the information provided is accurate and true.

Compulsory nature of the information requested

All our forms have an asterisk (*) to indicate which details are compulsory. If the user does not complete these fields, or does not check the privacy policy box, the information will not be sent.

Rights of data subjects

You have the right to access your data and obtain confirmation regarding the processing thereof, as well as a copy of the personal data being processed. You have the right to update them and request that any inaccurate data be corrected, or request removal of the data when they are not necessary for the purposes for which they were collected. You may request a restriction in the processing of your data and object to them being processed by revoking your consent, and also exercise your right to data portability. Similarly, you have the right not to be the subject of decisions based solely on the automated processing of your personal data. You may exercise your rights by contacting us legal@globalholdings.es. And also to our DPD: dpo@globalholdings2000.es

If you consider that your rights have not been duly respected, you have the right to lodge a complaint with the Spanish Data Protection Agency www.aepd.es.

Processing of the data of Minors

Anyone providing data through the forms on this website and accepting the processing of such states that he/she is at least 14 years old. Access to, and use of the website is prohibited for anyone younger than 14. If, at any time, the Data Controller detects that a person younger than 14 years of age has provided personal data, we will cancel said data. In addition, parents or tutors may in any event write to GLOBAL HOLDINGS 2000 S.L. to block any access account created by minors in their charge who have registered by falsifying their identity.

Social Networks

The object of social tools such as Facebook, Twitter, Instagram, etc. or other social networks is to give visibility and dissemination of the activities that take place in our organization. These social tools store personal data in the servers of the corresponding services and are governed by their own privacy policy. It is recommended to review and read the conditions of use and the privacy policy of the social network at the time of registration, taking into account the different configuration's possibilities regarding the privacy of the user's profile in the social network. In addition, the Controller reserves the right to erase from its social networks any published information by third-parties that trespasses the legality, encourages to infringe it or contains messages that infringe upon human dignity or institutions. Likewise, the Controller reserves the right to block or report the author's profile of such content.

Cookies

A cookie is a small file that is downloaded and stored on the user's computer when he/she access a website. Cookies allow the website, amongst other things, to store and recover information on the browsing habits of the user or of his/her computer and, depending on the information they contain and the way in which you use your computer, they may be used for user recognition.

The user has the option to prevent the generation of cookies, by selecting the corresponding option in his/her browser program. You can obtain more information by reading our <u>Cookies Policy</u>.